om: Daniel Sakaguchi
ent: Friday, June 10, 2011 10:41 AM
: 'Robinson, Matt'
: Nicholas B. Clifford, Jr.
ubject: HSI - supplemental production

att,

day, if possible, we intend to produce native versions of the CCC program and Life Skills Academy, ansitions and Foundations programs, per your request. We will seek to produce the documents in a anner that permits cross-referencing with the bates ranges of the documents as they were previously oduced. We also will seek to indicate which documents were produced for "attorneys eyes only" -- as s will not be apparent in the native format.

th respect to Plaintiffs' most recent Requests, we are also producing, as confidential and "attorneys es only" the following:

he "existing Special Care Unit Manual," which we also understand to be the "Special Care Unit info" sponsive to Requests 1 and 5.

he attachment to HSI02246 referenced in Request 3.

he attachments to HSI03214 referenced in Request 4.

e have been unable to locate the attachment labeled "Life Skills University.doc" referenced in Request however our investigation continues and if we are able to locate this document, we will produce it.

stly, while we understood that the "27 Degrees" video referenced in depositions last week had been oduced, we are producing it again out of an abundance of caution.

st regards,
niel

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